

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-I and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Dated: May 4, 2016

EXHIBIT A – BARON & BUDD, P.C.

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-CV-00751	Margaret Larson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – CAPSHAW & ASSOCIATES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-18115	Nancy Marx v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT C – DANIELS & GENTLE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-26733	Frances J. Payne v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT D – HOLLIS WRIGHT & COUCH

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-CV-03976	Linda McMeans v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT E – KLINE & SPECTER

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-CV-04398	Johnetta Bradley v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – MILLER WEISBROD

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-12073	Sara Campos v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT G – THE MOODY LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-07321	Hallie Hawkins, Jerry Hawkins v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation
2:13-CV-00806	Linda Friedrich, David Friedrich v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT H – THE POTTS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-05719	Carolyn L. Andreola v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-05130	Barbara Johnstad v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation
2:14-CV-07226	Afsaneh Pahlavan, Daryush Pahlavan v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT I – WILLIAMS KHERKHER HART BOUNDAS, LLP

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-12599	Janet Michelle Gerharter, Keith Gerharter v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-12865	Carolyn Ann Booth, George Walter Booth, Jr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-13128	Penny Gibson, Michael Gibson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-21021	Bobbie Denise Tiner v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-27248	Suzanne C. Esaine v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation, C. R. Bard, Inc.
2:13-CV-32531	Bonnie Lou Teal, Clark Teal v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation
2:14-cv-10702	Veronica Woodring, Philip Woodring III v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-12829	Annie Crain, Kerry Crain v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-16269	Mary Jane Andrews, Robin Andrews v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis